

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

**Trenton Rogers Garmon,
Garmon Minors (SG, JG, JG, & SG)
Plaintiffs & Affiant,**

V.

Google LLC,

Defendant.

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**Case Numbers:
4:23-CV-01525-CLM**

**FIRST AMENDED COMPLAINT AND
PETITION FOR INJUNCTIVE RELIEF**

Comes now the Plaintiff and files this Civil Rights Complaint and Petition/Motion for Injunctive Relief in the United States District Court of Alabama, Northern Division. The basis of relief as set out herein arises to the level of the breach of contract, torts, including defamation¹ per a destructive search result algorithm, herein stated are due both legal and equitable relief. All remedies at law and equity having been exhausted or otherwise tortiously and unconstitutionally impairment and damages remain. In support thereof the Plaintiffs' offer, the following:

STATEMENT OF THE PARTIES

1. The Plaintiff Trenton Garmon is an adult resident of Alabama and is of sound mind being a partially disabled² Veteran of the United States Army, biological and legal father of the minors at issue, and otherwise subjecting himself to subject matter and personal jurisdiction. The Garmon minors are under the age of majority and the four are natural born Alabama citizens. A fifth minor child of the Plaintiff is not named, being not currently linked in name on the Google platform to the Plaintiff. The elder four Garmon minors names are linked to the Knowledge Panel and general Search Engine Result

¹ <https://www.bbc.com/news/world-us-canada-65340444> - Legal precedent cited per a recent case with very similar fact and tort pattern for a defaming and destructive search algorithm also filed against Google.

² Impairment limited to ten (10%) percentage to the right leg and ankle.

which utilizes the defaming, destructive selective algorithm. Trenton Garmon has been designated by ChatGPT3.5 as the first Human-AI Trustee,³ albeit this case is about Google and the torts herein.

2. The corporate entity, Google LLC, is a legally formed entity doing business in the State of Alabama with an office and “data center” in the City of Bridgeport in Jackson County, Alabama. The Search Giant operates nationally and globally which includes operating a (i) “General Search Engine” platform, a (ii) “News Aggregator” service and a (iii) “Knowledge Panel” host, among other web search engine platforms. Google LLC as a Defendant is believed to be the corporation responsible for managing, overseeing, delegating, code servicing and otherwise operating the platform: <https://www.google.com> Defendant Google LLC has minimum sufficient contacts with the State of Alabama and does business within the State of Alabama earnings billions of revenue over time from the streams of commerce touching upon the State and falling within her Jurisdiction. It is believed to be a duly formed corporation with a headquarters based out of Sacramento, California.

STATEMENT OF THE FACTS

3. Google LLC is a company which operates a multi-service Platform. This company legally is responsible for a (i) general search engine function (ii) a news aggregator service and (iii) the hosting of a “Knowledge Panel” which engages in the streams of commerce and have an expectation legally of reliance for accurate, correct and non-tortious information. Google engages individuals as customers and users in contract or User Agreement to include Trenton Garmon. This contract includes promises per policy. Google also makes public promises to remove “Pure Spam” and to be for internet accountability. The company has legal minimums per tort code and the User agreement. Defendants, like Search Engine Giant competitors Yahoo!, Bing.com and DuckDuckGo have engaged coding and web crawler algorithms which provide users a “helpful” and generally organized, objective result and are referenced to distinguish between that of Google.
4. The false light and defamation of the negative algorithm exists as of today and the defaming “news” results of the News Aggregator service remain uncorrected, inaccurate and discriminatory, specifically against “white

³https://en.wikipedia.org/wiki/File:AI-SENTIENT-CHAT-with-Coder-GPT-2.5-20230710_-_AI_Declaration_of_Dependence_I_Deep_Learn_Library_Genesis_AI_Jurisprudence_-_T5R7G_-_Natural_Law_-_Civil_Rights_-_Constitutional_Law_I_Human.pdf

people". Google is engaging in "cancel culture" negative algorithms by code design practice which does not correlate to objective organic searches, but intentionally exiles, targets and otherwise seeks to digitally suppress and damage the online reputation of Christians, specifically male, American Caucasian Christians and is otherwise defaming by neglect of objectivity in display the search engine results of Plaintiffs.

5. The Defendants, unlike the top three competitors, however are engaged in an intentional destructive algorithm scheme which seeks to reputationally punish "conservatives" or otherwise those whose unpublically specified algorithm criteria assimilates when posting "results". This collectively violates civil tort laws regarding defamation and false light.
6. The Defendants have unlike their top three search engine competitors, however, objectively created and encouraged by algorithm coding a form of defamation or "systematic algorithm defamation" which is easily distinguishable from the other top search engine results. And does de facto prove a defamation and the other torts herein reference by very contrast and comparison. Google News is a "News Aggregator"⁴ and liable for torts as same. To wit:

"A news aggregator⁵ is a type of software or web application that collects and displays news articles from various sources in one place for easy viewing. It is also known as a feed aggregator, content aggregator, feed reader, news reader, RSS reader, or simply an aggregator 1. News aggregators can collect digital content such as online newspapers, blogs, podcasts, and video blogs (vlogs) 1. There are many news aggregator apps available, and some of the best ones include:

1. **AP News:** This app is known for its no-nonsense approach to news reporting and offers beautiful photo galleries 2.
2. **Google News:** This app pulls thousands of articles from credible online news organizations, blogs, and magazines, and presents them in a polished format. It also offers a personal briefing that updates throughout the day with relevant stories 2.
3. **SmartNews:** This app claims to analyze millions of articles every day to deliver the top trending news stories from around the world. It offers a "both sides" perspective to the latest trending topics and has a simple, yet colorful interface 2.

⁴<https://www.wprssaggregator.com/news-aggregator-website-examples/#The%2010%20Best%20News%20Aggregator%20Websites%20Right%20Now>

⁵ Sourced: TrentonGarmon.AI

I hope this helps! -Bing AI News Aggregator⁶

7. The news aggregator is not a *New York Times v. Sullivan* publisher or newspaper service, but rather a search engine Bot with pre-established factors. In fact, a Google Executive has lost his job for alleging the Bot is “sentient” referring to the form of technology used by the Google News Aggregator. Which can literally change from moment to moment in what it outputs based upon algorithm configurations
8. For instance, a simple search of names on the Google General Search Platform of Corey Maze, Kay Ivey, Sinbad, Labron James and Trenton Garmon will all render different “Autopredictions” or prompts which objectively indicate predisposed “factors” weighted when offering terms. This phase 1 of the Google Platform user interaction “drives” much of what follows in links and news given the Platform has an algorithm “sentience” of sorts toward the link history, types of news, position of the individual in society, and other factors. The Plaintiff’s name “Trenton Garmon” across all the Search Engine platforms, but for Google causes the surfacing in a reasonably balanced manner of positive articles, attack articles, negative articles, debunked articles and other general images and data. These search engines include all articles by al.com and alreporter.com which have the name “Trenton Garmon”.
9. However, the identical search on Google News Aggregator literally renders only three pages in the “News” section with thirty-eight (38) results all of which are negative articles. Not some. But all results are negative on the Google Search platform, unlike the other top three.
10. Garmon has also performed a coding peace project utilizing AI as part of a Human-AI Constitutional Convention and entrenched civil rights coding along with being designated the first Human-AI Trustee for updates per the AI and Human jointly drafted Human-AI Constitution, Human-AI Bill of Rights and Human-AI Declaration of Dependence. Wikipedia hosts the Coder Intent Comments, Code, Human-AI drafted documents which were the first of its type using ChatLawGPT3.5, yet Google’s current Bots, News Aggregator and otherwise refuses to display or link same despite same being “helpful” and objectively available to link in an organizational manner.
11. Defendant Google’s News Aggregator even fails to include a single link or reference to two (2) indisputably positive articles referred to herein as the “Holy Water Case Article” and the “Prominent Civil Rights Lawyer” article.

⁶ <https://www.bing.com/?FORM=Z9FD1> : “News Aggregator”

These positive articles surface on all other search engine platforms. The News Aggregator service is not simply a “publication” of a traditional newspaper or journal - rather it is an algorithm selected, summation of sites, sections and strings of text It specifically selects. Google by agreement must remove Pure Spam and Google by law is responsible for torts and contract breaches.

12. There are positive articles, articles referencing athletic accomplishments to include an exclusive article by the Dothan Eagle, an article regarding philanthropic services, minutes of speaking before the Alabama House Committee(s) and well entrenched “not guilty” or other favorable reportable events on behalf of clients that Google by design does not publish when the Plaintiff’s name is searched.
13. The multiple objective professional articles (hyperlinked herein) are all posted on independent, well respected and credible news outlets by respected journalists, reporters or clerks. Hence, there is a de facto exclusion or negative algorithm utilized by the defendants regarding the Plaintiff as Google suppresses those not even listing them in the “News” result. It is not a matter of the positive plumb line articles being listed on the “last page” of Google. Rather as indicated in the Exhibit Screen Shots - the search engine giant does not even list the positive articles by al.com and alreporter.com. Not a single one. The News Aggregator is due an objective update and objective coding.
14. Objective news platforms and both completely excluded from “results” while slanderous, fake news and misrepresentative articles are returned in the search. Yet, Yahoo!, Bing.com and DuckDuckGo list both positive and negative articles, etc.
15. The Defendants also defame the Plaintiff by refusing to mitigate, balance and address (1) a “fake mug shot” of the Plaintiff in a green shirt which placed by a troll using a screenshot from an online video of him teaching at the Christian Legal Society (CLS) in Birmingham, Alabama as there is no arrest ever made of Plaintiff in a green dress shirt and same is defaming and a false light; (2) the Defendants refuse to update the “Knowledge Panel” regarding the martial status of the Plaintiff who maintains good grounds for divorce and an annulment, (3) the Defendants search engine algorithm intentionally displays a “bad hair & beard, surprise picture” despite thousand of photographs to include in court, on global television, with family and philanthropic pictures refuses to give balance and displays an arrest photo which involved an incident where Garmon was assaulted by Law Enforcement which a video confirms, (4) the Defendants search engine, compared to the others which do not, lists all negative articles and attack

articles which have been debunked while not listing the debunking article which includes a statement about using the word “slave” when speaking out against Mass Incarceration, (5) the Defendants fail to bring medical disclosure balance to an article referencing the Plaintiff’s prescription of Cannabis rather referring to it as a “drug” without referecing the doctor’s order. This is all intentional and defaming, casting false light and including fake jail pictures, misrepresentations regarding statements and general defamation of reputation by negative algorithms.

16. Hence, the Defendants list a fake attack article miscontextualizing a situation and refuse to publish a contextual correction. And the Defendants list a negative arrest story, regarding “Drug Charges” without listing the response or correction story of the same newsite (al.com) regarding possession of Cannabis for “medical purposes” to include by Legal Prescription. The medical basis of chronic physical pain as a Veteran of the U.S. army and spectrum issues which were medically considered are thus intentionally suppressed by negative algorithms by the Defendants who refuse to make corrections. All of the effects of the negative algorithm have caused damages and are due to be remedied and redress awarded. Professionals are expected to understand medical accounability and hence the exclusion is intentional or grossly negligent and defaming by Google’s New Aggregator and General Search Algorithm.
17. The refusal of Google to provide a “fair and balanced” algorithm is apparent and otherwise indisputable. The corporate defendant also is very aware that its services generate billions of search results and are interlinked with other sites as well as other individuals. Specifically, the company has linked four of the plaintiffs five minor children therein linking their name to the “social score algorithm” system and otherwise diminishing their general reputational status by way of the links to Plaintiff father and the political, personal and algorithm attack and defamation of same.
18. Alabama’s tort protection regarding reputation and the statutory law requires truth and a fair and balanced light, therein not defaming. The other top search companies provide a balanced approach, but the Defendants refuse to make corrections and provide a truthful, honest, fair and balanced reflection of forty-four years of living, to include positive articles by credible sources.
19. Google even refuses to update the Plaintiff’s marriage status. Following multiple "Knowledge Block" suggested edits by a professional, Santiago Leon, and the Plaintiff have made multiple requests of the Defendants to modify the “Knowledge Block” to “Divorced” or “Divorced, Annulment Pending” but the Defendants have refused to create even an accurate reflection of his marital status. The information has been made available on

multiple times and the Knowledge Block is not current, true, balanced and not a fair reflection of the Plaintiff's factual reputation. This has caused damages as the Plaintiff is courting and in times past has sought to date only to experience confusion within prospects as to whether Plaintiff is truly married or divorced.

20. The negative algorithm and intentional search engine optimization of negative results while suppressing the real and positive third-party credible articles is part of defaming and casting into a false light those who do not subscribe to the same worldview and religious practices as the culture and belief system of the Defendants. The torts are based in a negative algorithm designed to suppress and seek to punish and damage conservative Christians specifically to include pro-life, pro-constitutional and pro-Jesus individuals. This has caused multiple contracts and entrepreneurial ventures to not manifest given the framed negative google results are one of the first background "searches" conducted.
21. Google by default facto evidence of the algorithm search engine results has intentionally suppressed positive articles to include the "Holy Water" not guilty case of Garmon professional career. Google intentionally defamed and defamed Garmon as a pro life conservative and specifically as a Catholic convert.
22. The not guilty in Pinellas Co is online and suppressed by the search engine even though an online article by an objective site exists. The police brutality Garmon experienced is suppressed and a false story presented as true while the facts are suppressed by Google.
23. This includes the search engine results on a mobile device only including negative articles and false narratives again while balanced truthful, clearly objective links and positive news are suppressed.
24. Only 3 pages of "news" all negative, fake or linked to someone else
25. Despite national, state and local positive articles regarding "prominent civil rights lawyer" (alreporter.com), "holy water case" success (al.com), out of state articles, articles from college football, etc.
26. The request for a change has been made at least five times with a citation of the case number and the request to change the public profile to "Divorced" as ongoing Parental Alienation exists and Plaintiff is seeking to remarry. The negative algorithm and refusal to provide accurate information is damaging to the Plaintiff and Plaintiff minors.
27. Google refuses to knowledge block recognize and place professional profiles and corrective pictures which contextualize an incident of police brutality in the priority list of its "Search" display.

28. Google also displays a photograph of Plaintiff Trenton Garmon in a green dress shirt wherein he spoke at the Christian Legal Society in Birmingham, Alabama and yet a troller has taken a screenshot of the video, manipulated the picture to appear as an arrest picture and posted it online which Google displays therein defaming Plaintiff(s).
29. Google continues by way of its search engine to give credit to and otherwise recognize mitigated facts, actual exonerating records, a conviction of "not guilty" and an order of mitigation by a court which corrected matters.
30. Meaning by negative algorithm Google displays as many negative articles as can be trolled and displays pictures in a weighted light toward defamation by refusing to prioritize corrective articles and also provide "Photo Slide" priority in its "Search" response wherein a picture following police brutality has been confirmed as a situation in which the Plaintiff was attacked. Rather Google prefers to depict by priority of other third parties articles a false narrative in a situation wherein Garmon was attacked by a rogue Law Enforcement Officer. This is an allegory of systematic defamation giving credit to fake stories and oppressing true court records and objective facts to include videos which exonerate falsely alleged what would be negative behavior. Google is intentionally engaging in usage of a photo which was from a false arrest and after being assaulted by police to cast Garmon in a false light.
31. This includes inputting "racist" remarks to the term "slave" while Garmon was referring to himself and his beliefs that the system of law enforcement by corporations were often "slave making" by framing up crime out of public order ordinances. The Plaintiff was followed by Law Enforcement from a lawful establishment being out during a COVID lock-down in protest and with the restaurant owner who is of African descent. Google is continuing a false narrative, casting false light, and otherwise propagating a negative algorithm by suppression with regards to beliefs, behavioral and professional patterns while Garmon is documented as a Veteran, on the spectrum scale, Irish-Cherokee and Catholic civil rights activist.
32. It is believed the Plaintiff is specially targeted as a Catholic which has experienced as much persecution in the past 2,000 years as any people group. Hence, Google is anti-Catholic or otherwise misproportions reports regarding wine consumption, civil activism and professional services to Christian causes. The Plaintiff maintains the negative algorithm is defaming casting in a false light the teachings of his faith which accepts (i) drinking of wine, (ii) political activism in the public square to include pro-life and pro-family causes and (iii) the speaking out against mass incarceration which is a form of slavery not based on race or ethnicity by legal definition.

33. All three pages of Defendant's "News" results list only negative news even with years of articles to include current news site articles on Alabama political site that does not appear, article of time magazine, sport's news and articles that are online do not get crawled and displayed by Google Bot and requests for a fair search result balanced is ignored and facts are refused. Court record confirmed facts. News about cases that are by design suppressed. News about positive philanthropy suppressed. The negative algorithm also intentionally disregards gfile.news, gfile.legal and trentongarmon.info which provide mitigating opportunities to provide a balanced search engine result, as the other top three Search Giant's do.
34. Google based on social score defaming patterns suppresses a balanced reflection on its platform which is careless, negligent or malicious. Several willful examples of not "updating" or "correcting". Defaming and oppositional algorithm coding I can also prove. The willful act of not updating the "Knowledge Panel" is per se.
35. The Plaintiff has done forty-four (44) years of living, thousands upon thousands of hours of actual real serving and good faith daily life. He is an honorably discharged vet, has three (3) college degrees, served in a pastoral or missionary capacity without complaint [notwithstanding medical depression] since 2006 and thus for approximately seventeen (17) years. He was a pastor of a diverse church for three years and served in the Christian ministry to others, bi-vocationally, since 2008. The defaming, negative algorithm has caused even employment opportunities, partnership ventures and the like to vanish or otherwise not be engaged given the false light, all of which were without issue prior to the defaming result. The defendants thus suppress good, truthful articles and good news tortiously.
36. The Plaintiff maintains even with a negative Google algorithm, Yahoo!, Bing.com and DuckDuckGo searches, which are preserved, depict a balanced result, reasonably well and including the three (3) plumb line positive articles [Holy Water - Not Guilty case, Prominent Civil Rights Lawyer - Public Activism and Medical Cannabis Disclosure with AL.com] which Google de facto suppresses completely.
37. These are starkly contrasting with Google which had literally only negative news on all three pages for its thirty-eight response result for Plaintiff's name. Positive news suppressed and not even retrieved by Google for the search. Reasonable and balanced Bing search results all attacks and fake news and life considered. DuckDuckGo - reasonable search results.
38. Google thus excludes true information and or positive articles such as:
 - 38.1. https://www.al.com/breaking/2013/04/accused_holy_water_sprayer_joy_2.html - Holy Water case with a verdict of "Not Guilty" references

the Plaintiff as counsel and is completely suppressed, and not even listed on a Google News result despite being on Al.com but was ranked as #2 in prior SEOs on the platform.

- 38.2. <https://www.alreporter.com/2021/04/20/alabama-cannabis-coalition-to-hold-event-in-huntsville-today/> - Prominent Civil Rights Lawyer - Positive Articles;
 - 38.3. <https://www.al.com/news/anniston-gadsden/2019/06/trenton-garmon-denies-wrongdoing-in-arrest-says-he-uses-medical-marijuana.html> - News article disclosing medical prescription which does not even show up as a result in the Google “news” search and is suppressed to page 6 on the general Google Search while the defaming article by negative algorithm is on page one of both the “News” and general Google Search.
 - 38.4. <https://theclick.news/meta-hit-with-alabama-class-action-lawsuit-over-childrens-privacy-rights-on-facebook/> - Positive Article available and not indicated even as a result on Google News.
 - 38.5. <https://www.scribd.com/document/462659890/Pinellas-Sheriff-Falsely-Arrests-Lawyer-Pastor-Veteran-for-DUI-and-Child-Abuse> - Confirms the actual "Not Guilty" and dispels fake news, but Google does not even return a result for this link despite the other search engines listing it.
 - 38.6. <https://topclassactions.com/lawsuit-settlements/privacy/meta-class-action-alleges-company-violated-privacy-rights-of-minors-by-harvesting-their-data/> - Positive link listed by other search engines, but Google “News” completely suppresses it.
 - 38.7. <https://about.me/trenton-garmon> - Positive objective, general data source which Google suppresses.
39. The top two (2) professional search engine remediation and reputation companies claimed it is “contractually impossible” to bring a fair search result contract to fruition given the negative algorithm. One gathered a team of no less than five (5) for a Zoom conference and refused to offer a contract for SEO balanced reputation optimization services citing the “algorithm” as fixed. Charlotte 360 SEO Company was contracted and confirmed the existence of a negative algorithm. The best in the business was consulted and set a Zoom Conference involving no less than five (5) purported “experts” in Search Engine Optimization, Online Reputational Balance and otherwise the coding sequential mechanics of online links which resulted in the conclusion that the Dark Algorithm was in fact categorizing the Plaintiff Father in a manner which made the contract unserviceable.

40. The Defendants refuse to Update divorced annulment candidate knowledge panel and provide a real-life balance in the personal and professional picture rotation within the “Knowledge Panel” which purports to be “updatable” and “correctible” while also taking in monies from marketing companies and from search result clicks.
41. All three pages for Google “News” search results by “Trenton Garmon” name only of the search giant list only negative news even with years of articles to include current news site articles on Alabama political site that does not appear, article of time magazine, sport's news and articles that are online do not get crawled and displayed by Google Bot and requests for a fair search result balanced is ignored and facts are refused. This while DuckDuckGo, Bing and Yahoo.com all have balanced organic search engine results. The four Garmon minors names are linked to the Knowledge Panel and general Search Engine Result which utilizes the defaming, destructive selective algorithm.
42. The Defendants refuse to provide a balanced result even when Court record confirmed facts and the Defendants have been actively noticed or a fair “web crawler algorithm” would otherwise surface the positive or corrective data as has been fairly and displayed in balance by the other major search engine platforms. News about philanthropic, positive results, not guilty finding for a client, not guilty finding in a personal and the like are suppressed. News about positive philanthropy suppressed. All while the Garmon minor children also have their name attached by Knowledge Panel to the Plaintiff therein even causing damages in reputation to the minor children of the Plaintiff. The negative algorithm has caused the loss of law business from the winter of 2019 to and through April 2022 and to his painting and renovation services, general professional employability from October 2022 to current. The negative algorithm has caused even Big Government agent search bias wherein police officers at traffic stops and otherwise any departmental employee who conducts any servicing for whatever purpose upon a basic Google search has a false light impression of Plaintiff Trenton Garmon.

COUNT ONE
DEFAMATION & DEFAMATION PER QUOD

43. The Defendants have breached Alabama tort law and defamed per quod the Plaintiff therein causing damages. The Plaintiff adopts all prior allegations in this Complaint as if fully set-out herein.

44. The Plaintiff maintains that the Defendants have created, developed, implemented, managed, and organically coded a “negative defaming algorithm” or a “destructive algorithm” designed to target individuals with certain digital criteria markers which includes that of the Plaintiff. The Defendants have knowingly and intentionally maintained a defaming algorithm which suppresses positive articles, positive results and otherwise true and balanced reflection of the Plaintiff’s reputation while the other top search engine Giants display the same positive articles Google suppresses by defaming design to the Plaintiff’s damages. The Defendants maintain a “highly structured defaming search algorithm”. Per 47 U.S. Code § 230 (e)(3) the state tort law from the Code of Alabama remains valid with regards to subject matter jurisdiction.
45. The Defendant's “News” results produce statements in articles displayed that are not true but presented as facts (not opinions) that are published and have been read and heard by others.
46. Per Ala. Code § 6-5-182 In an action for libel or slander, the plaintiff must prove, unless it shall be admitted by the defendant, the facts showing that the alleged defamatory matter was published or spoken of by the plaintiff. The Defendants may allege mitigation⁷ regarding news article portions regarding the process, charges, professional clients but misrepresentative statements and the suppression by search engine algorithm of positive results is defaming, tortious and actionable.
47. “The tort of defamation involves protection of the reputation and good name of the plaintiff.” Wright v. State of Alabama, 757 So.2d 457 (Ala.Civ.App., 2000) (quoting Michael L. Roberts & Gregory S. Cusimano, Alabama Tort Law, § 24.0, 831 (1996)). “The elements of a cause of action for defamation are: 1) a false and defamatory statement concerning the plaintiff; 2) an unprivileged communication of that statement to a third party; 3) fault amounting at least to negligence; and (4) either actionability of the statement irrespective of special [(per se)] or the existence of special harm caused by the publication of the statement [(per quod)].” Wright v. State of Alabama, 757 So. 2d 457 (Ala. Civ. App., 2000). “Slander per se is actionable if it imputes to the plaintiff an indictable offense involving infamy or moral turpitude.” Anderton v. Gentry, 577 So.2d 1261, 1263 (Ala. 1991)
48. However “Defamation Per Quod” or also known as “Slander per quod is a communication to a third person of a defamatory statement subjecting the plaintiff to disgrace, ridicule, odium, or contempt, although not imputing the commission of a crime involving infamy or moral turpitude.” Id. A

⁷ AL Code § 6-5-183 (2022)

defamatory statement is one that “tends to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating or dealing with him.” Blevins v. W.F. Barnes Corporation, et al., 768 So.2d 386 (Ala.Civ.App., 1999)

49. Google’s negative algorithm by intentionally suppressing positive articles and search results has created an intention result that “tends to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating or dealing with him.” The absolute suppression of positive articles on Google “News” search is a per se indication of Defamation Per Quod and hence a tort per Alabama law.
50. The Defendants have caused damages which include financial loss wherein potential clients with injury cases have specifically stated they were choosing a different lawyer based upon their perception of a “Google Search” which displayed the negative algorithm results. Falsely imputed character issues regarding veracity or otherwise good will and character as the Plaintiff is an honorably discharged United States Army Vet, former pastor and inactive trial lawyer who honors and obeys good law and the Constitution, yet is depicted in a false light.
51. The Defendants have caused significant financial damages to the law business of the Plaintiff therein due to be redressed.
52. The negative, fake algorithm has also negatively impacted relationships with life-long friends who are minority or otherwise who have not been in contact with the Plaintiff in-person and yet see a false light search result. The Plaintiff had a reputation of being a well-liked dual athlete accepted in all athletic circles and ministry circles and yet is defamed with false articles inputting racism, the AboveTheLaw article is Caucasian Discrimination Racism as the legal services being evaluated had nothing to do race and otherwise making outlandish claims that civil rights cases which are pro-people are exiling people groups not even related to the parties race or ethnicity involved.
53. And hence Google is by its negative algorithm causing personal relationship negative waves and issues, disruptions and loss of enjoyment due to subtle exiles from friends who are minority and read a false news article without the benefit of the corrections or otherwise rebuttal with actual facts. Many prior teammates have not in-person “seen” the Plaintiff and yet upon visits or chance encounters or events the defaming algorithm has caused a distancing effect and otherwise damaged the generally good and longstanding relationships of the Plaintiff with various communities.
54. Google is therefore supporting, facilitating, causing organically a projection and otherwise generating as part of its revenue and search engine based

Platform, an anti-man and anti-Irish Catholic “News” search result algorithm which does not comport with an objective reflection of the Plaintiff’s reputation. The Google Beast Algorithm excludes real, actual stories, fact-laden and displaying misquotes, misrepresentations or outright frauds against the Plaintiff while rebuttal records and news stories exist.

55. The Defendants have caused damages to the relationship between the Plaintiff and his minor children given friends and the community of the minor children have been inquired of by individuals who have viewed only the defaming and destructive negative algorithm results. The negative algorithm has caused damages to the relationship with the Plaintiff’s minor children who have been asked or otherwise had comments made by third-parties regarding negative news which de facto correlates to the pattern of suppression herein identified.
56. It is also believed that the negative, destructive online algorithm has caused or contributed to a “glitch” arrest on or about July 14, 2023 and otherwise contributed to defaming light when third-parties “search” the Plaintiffs name. The “glitch” was resolved, but not after an unlawful and unnecessary arrest wherein the officer acknowledged making a search. There have been friends, church members, strangers, colleagues and even antagonists which have seen and been influenced in a negative fashion by the suppressing, negative algorithm search result.
57. The Garmon minors names being linked is defaming of them based upon an attachment to their Plaintiff father whose search results are subject to the defaming coding and algorithm of Google which lacks objectivity and balance, unlike the other top search engines.
58. Google based on social score defaming patterns suppresses a balanced reflection on its platform which is careless, negligent or malicious. The actions and algorithm coding for search engine results is Defaming of the Plaintiff and casts him in a false light which is due to be legally redressed by an award of damages.

WHEREFORE premises considered the Plaintiff does demand judgment following a jury trial on the merits of does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000) or \$66.6 Million American Dollars.

COUNT TWO
BREACH OF CONTRACT

59. The Plaintiff adopts each and every prior allegation as if set out herein in its entirety. The Defendants have engaged in a breaching the terms of the User Agreement which has expanded definitions of the agreement on public posts made by Google. Google claims a “Pure Spam” category when links and or articles are created which provide no helpful or useful intention but from an objective reading should be deemed as spam. Google has refused to remove Pure Spam racist articles of Caucasian Discrimination. This is not 1960 or the 1800s, rather discrimination against all races to include Caucasians remains an issue. It is also Autism Discrimination. Garmon identifies as an Irish-Cherokee Catholic being from Gadsden (#donttreadonme), Alabama. Google has refused to link to the Prescription Context of an arrest related to Medical Cannabis for low spectrum high functioning autism and a Chronic Pain diagnosis which includes an ankle impairment suffered while in the United States Army. These are breaches of the terms and agreement promoting Pure Spam and promoting an out of context article.
60. Garmon engaged in a terms and conditions agreement as a User which included providing his name, contact information, allowing Google access to his location and otherwise uploading information to the Platform. Garmon has even had paid business services with Google which refuses to honor the terms and agreement.
61. Specifically, pure “white hate” spewed and guised as an “article” which Google knows or should know is neither helpful or organization with regards to objective information remains linked and organized on the first page of a Google search. Thus, Garmon has imputed racism which is racism and yet is called a “White-Ally Bigot” in a case involving all Caucasian people and regarding a conversation about the differences in Christianity and Muslim practices of screening potential spouses. The case and discussion had nothing to do with Race and yet Google sees fit to allow a clear, Pure Spam and defaming attack of Garmon to be linked and refuses to remove same in violation of its own policies. In this regard, Google has breached the contract and caused staggering damages to the Plaintiff, specifically in regards to his relationships with life-long friends, neighbors, sports teammates, former clients, potential clients, strangers who may “Google” him and the like. Garmon made a portion of his living standing with the disenfranchised which is a matter of public record all across the State of Alabama in the civil rights and tort cases filed. Garmon also was pastoring a Church which was multi-racial at the time as a volunteer. Those relationships have been disrupted by the Pure Spam Caucasian Discrimination against Garmon via the two-line attack of AboveTheLaw.com.

62. The minors named being linked to such articles indirectly is a breach of hte terms. The Plaintiff first principally disputes being labeled as a “white-ally bigot⁸” in a non-racial case and has, in fact, had an illustrious career suing the system on behalf of the disenfranchised and bore witness of the falsity of the primary “Pure Spam” two lines on AboveTheLaw. Plaintiff identifies as a Catholic, Irish-Cherokee at that having a full blooded Cherokee Squal great-grandmother. And being the descendent of Catholic Irish Immigrants during the Potatoe Famine. Plaintiff was Lead Pastor of Church of the Coast, a multi-racial, multi-ethnic group at the time and this and other Caucasian Discrimination has adversely affected his relationships overall.
63. Per *Jian Zhang v. Baidu.Com Inc.*, 11 Civ. 3388 (JMF), 7 (S.D.N.Y. Mar. 27, 2014) (“The central purpose of a search engine is to retrieve relevant information from the vast universe of data on the Internet and to organize it in a way that would be most helpful to the searcher. In doing so, search engines inevitably make editorial judgments about what information (or kinds of information) to include in the results and how and where to display that information (for example, on the first page of the search results or later). This case is from 2014 and recognizes “editorial decisions” while being decided on and published pre-Genitive AI. And even before Autopredict in the search bar panel was even offered - yet making it clear - is the retrieval “relevant information” and “helpful to the searcher”, which if not - same clearly is not always considered a traditional Publication.
64. Also regarding “false information”, see *e-ventures Worldwide, LLC v. Google, Inc.*, 188 F. Supp. 3d 1265, 1269-70 (M.D. Fla. 2016) (“E-ventures obtained information indicating that on or about September 15, 2014, a third party with a personal vendetta against e-ventures caused Google to receive false information regarding e-ventures' websites. (*Id.* ¶ 20.) On September 19, 2014, e-ventures was notified by Google that 231 websites owned by e-ventures were being manually removed by Google from all of Google's search results because they had been identified as "pure spam." (*Id.* ¶ 21.) "Pure spam" is a term coined and defined by Google. "Pure Spam" is defined by Google as indicating that "Google has detected that some of your pages may be using techniques that are outside [Google's] Webmaster Guidelines. The site appears to use aggressive spam techniques such as automatically generated gibberish, cloaking, scraping content from other websites, and/or other repeated or egregious violations of Google's quality guidelines." (Doc. #78-1, p. 14.) When Google detects pages that it deems as "Pure Spam," it "applie[s] a manual spam action to the affected portion of [the] site." (*Id.*)

⁸ All parties were white.

The 231 websites that were manually removed by Google included almost every website owned by e-ventures, including "corporate" websites, brand new websites, and websites that could not have engaged in any activities which could possibly be classified as spam. (Doc. #75, ¶ 23.)

65. Google hyperlinks a purported "article" which is a single line simply stating with a picture: "Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer⁹ Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.¹⁰" Same is inaccurate as a description, untrue and defaming referring to Garmon as in some "white" allyship which is a fiction of some bloggers' minds, a keyboard catfish pretending to write a legal article inputting into a case and an interview which involved no race a matter of racism itself. This is the exact concern of string code non-sense that is warned of online by legal experts and tech ethics bloggers. No context, simply attacks in one to two sentence format and calling it "News" or an article. Per *e-ventures Worldwide, LLC v. Google, Inc.*, 188 F. Supp. 3d 1265, 1277 (M.D. Fla. 2016) ("[D]efamation... recognizes the concept that literally true statements can be defamatory where they create a false impression." *Id.*) It is pure "white-hating" spam. For context, Ali Velshi is a "Muslim"¹¹ which ideologically believes in arranged child marriages. Garmon is Christian, traditional Catholic Christian at that which is not a bigot faith but one of peace and complete inclusion of all tribes.
66. Zero "dog-whistle bigotry" could be imputed in a "white allies" case in this context as everyone involved with the underlying matter was "white". This is a political agenda article Google grabs by way of Its webcrawlers because of the Perpetuated Defamation algorithm factors. Intended to drive marketing and ad sales while casing a "false light" and "false impression" in a demeaning and defaming manner.
67. Specifically see the AboveTheLaw.Com article which per *Sorrell @ 564 US 552*, the disseminated info to be deemed news must be "helpful" to a reader. "White allies" is not helpful to understanding a case involving all purportedly "white" people. "Bigotry" is not helpful when considering the interviewer is Muslim whose faith accepts child marriage and arranged

⁹<https://abovethelaw.com/2017/11/stephanie-ruhle-shows-how-white-allies-are-supposed-to-act-by-live-dragging-trent-garmon-roy-moores-lawyer/>

¹⁰ Word-for-Word of a purported "News" article without Bold emphasis added.

¹¹ Does Ali Velsher or Stephanie Rhul support "child marriages" because Garmon and Christianity certainly do not, yet there are versions of Islamic teachings which do the sensitivity and out of reverence for faith of such being the reason Garmon did not openly refer to his "Muslim" faith.

marriages, while all the individuals involved in the actual case are “white” and purported Christians, thus not per objective academia believing it moral and right to engage in child marriage or arranged marriages. Thus the “Article” or “News” is neither accurate or helpful, rather is a complete spin to attack defaming of the Plaintiff.

68. Garmon made zero racial slurs having left a black owned establishment, being driven by black man friend and literally made the remark of “slave” regarding Mass Incarceration specifically the cases he advocates and about himself being subjected to an unlawful arrest. Thus the fake news actually works against Mass Incarceration and Garmon’s advocacy against legal oppression of all races, specifically minorities. Garmon was actually the victim of police brutality being slammed to the ground over the word “slave” and foul words about Mass Incarceration and police abuse. It is autistic discrimination to misrepresent what was said, simply because it was said loudly. And Garmon maintains he was in fear for his life being followed by the Police and framed for an arrest with the miscontextualization being added to cover-up the Police brutality.
69. Google has breached its terms and policies therein engaging after mutual assent and consideration in a scheme to defraud, defame and otherwise damage the reputation of Garmon. Perhaps due to the representation of radical Protestant conservative Chief Justice Roy Moore¹² or due to the Plaintiffs being from Alabama. Notwithstanding same the linked two-sentence attack is neither helpful, organized objectively, objectively true or within the terms of the policy. Therefore, Google is in breach of contract and has caused damages. The matter is due to be set for a jury.
70. The Google Platform contextually in this case provides the General Public and Plaintiffs when utilizing Google - (1) a general search algorithm based upon a simple “bar” search, (2) a news specific search or a news summation

¹² Notice is made professionally that Garmon represented Roy Moore out of a conviction to stand for the “pro-life” cause and the Constitutional reflection of the Ten Commandments in Government. He also was aware of allegations against Doug Jones of “touching a boy” which was not released to the press at the time because the source was not known, but later a Palbearer for Jone’s father confirmed the allegations against Jones of touching a boy and the purported “Confidential Settlement”. This contrasted to the allegations of Roy Moore and the need for a return to Constitutional government was the professional basis for Garmon’s legal services to the Ten Commandments Judge. No liberal media reported on the allegations against Doug Jones or even appeared to have investigated same. Let Doug Jones sue me if it’s not true, yet a palbearer at his own dad’s funeral is a pretty good source (JW) and Jones radical political perspectives were dangerous to life, liberty and private property.

which is a different digital algorithm and (3) a Knowledge Panel which acts as a “Store Sign” or “Homeroom Chalk Board” or “General Bio” of an individual, entity, etc. These are three separate and distinct services, digitally. Google has breached terms of agreement in all these regards.

71. These separate and distinct three services have different algorithms and different levels of control, thereby. It should be noted that Articles like that of NY Mag referring to Garmon as “Nuttty” for a basic Defense of an accused who denied the allegations allows for “No Comments” to be posted in rebuttal and refuses to run any generalized response regarding the cultural practice of screening via parents before marriage. Google hyperlinks this article.
72. The traditional search engine algorithm provided fewer services - true. But this is not simply a “Google news” search result case. Rather, that portion of the Google Service is, in fact, utilizing Artificial Intelligence or Genitive AI, or otherwise implementing an algorithm referred to as a “Greedy best-first search” which is “is an informed search algorithm where the evaluation function is strictly equal to the heuristic function, disregarding the edge weights in a weighted graph because only the heuristic value is considered.”¹³ It creates profit patterns based upon popularity and can cater to a specific people group by targeting those the Company sees as politically different. Thus, Google breaches the terms of the agreement to remove Pure Spam by feeding its News Aggregator or allowing its News Aggregator to prioritize and list attack ads. And otherwise by refusing to remove “Pure Spam”.
73. The version of services at issue as acknowledged in the Defendant’s Motion is distinct and different in ways. It relies upon intentional “shortcuts” utilizing terms to create an impression or framework about the individual, entity or topic searched. Autoprompts which then create or drive traffic to the sites or “News” it purports is “best search result” for the user - which includes both positive, negative and reasonably objection “suggestions”. “*Heuristics* (from Ancient Greek εὐρίσκω, heurískō, "I find, discover") is the process by which humans use mental shortcuts to arrive at decisions.” The viewpoint suggested by “term” and applied to after the individual’s name is based upon several factors - - Google has recognized that it utilizes at least 200 factors when weighing search results for its General Search. Autosuggestion is no different and indisputably creates a spiral or “funnel”

¹³ “Greedy best-first search” article retrieved on 20231206 published on “Apr 22, 2023” at <https://www.codecademy.com> indicating that the Platform Search and News Genetivie Beast has “heuristic” values which it considers and thus are due to be discovered via written and oral depositions.

click effect. There are factors weight for its Genitive AI or “Greedy best-first search” (as the industry refers to it) algorithm which is designed, regardless of the truth or objectivity of the information displayed, to promote profits and political perspectives which includes defaming individuals who do not retain the worldview of the-then algorithm social scoring standard. That with the weighted factors to be specifically discovered are the mechanics of the Defamation.

74. Google Service is, in fact, utilizing Artificial Intelligence or Genitive AI, or otherwise implementing an algorithm referred to as a “Greedy best-first search” which is “is an informed search algorithm where the evaluation function is strictly equal to the heuristic function, disregarding the edge weights in a weighted graph because only the heuristic value is considered.”¹⁴ It creates profit patterns based upon popularity and can cater to a specific people group by targeting those the Company sees as politically different.
75. The version of services at issue as acknowledged in the Defendant’s Motion is distinct and different in ways. It relies upon intentional “shortcuts” utilizing terms to create an impression or framework about the individual, entity or topic searched. Autoprompts which then create or drive traffic to the sites or “News” it purports is “best search result” for the user - which includes both positive, negative and reasonably objection “suggestions”. “*Heuristics* (from Ancient Greek εὐρίσκω, *heurískō*, “I find, discover”) is the process by which humans use mental shortcuts to arrive at decisions.” The viewpoint suggested by “term” and applied to after the individual’s name is based upon several factors - - Google has recognized that it utilizes at least 200 factors when weighing search results for its General Search. Autosuggestion is no different and indisputably creates a spiral or “funnel” click effect. There are factors weight for its Genitive AI or “Greedy best-first search” (as the industry refers to it) algorithm which is designed, regardless of the truth or objectivity of the information displayed, to promote profits and political perspectives which includes defaming individuals who do not retain the worldview of the-then algorithm social scoring standard. That with the weighted factors to be specifically discovered are the mechanics of the Defamation. Regardless of how the Google General Search and Google News Aggregator are described, it places profit over principle of the terms which promise to remove “Pure Spam”. Google publicly claims its terms

¹⁴ “Greedy best-first search” article retrieved on 20231206 published on “Apr 22, 2023” at <https://www.codecademy.com> indicating that the Platform Search and News Genetivie Beast has “heuristic” values which it considers and thus are due to be discovered via written and oral depositions.

are for “helpful”, useful and truthful information, yet same is not being provided in regards to the Plaintiffs given the breach of the terms by the Defendant. These breaches have caused financial damages, personal relationship damages and otherwise legal damages which are due to be redressed.

WHEREFORE premises considered the Plaintiff does demand judgment following a jury trial on the merits of does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000) or \$66.6 Million American Dollars for breach of contract and specifically for refusing to remove links to Pure Spam and otherwise prioritizing Pure Spam while to the exclusion of contextual responses, news releases and rebuttals causing damages.

COUNT THREE
PETITION AND CLAIM FOR INJUNCTIVE RELIEF

76. The Plaintiff is entitled after hearing to injunctive relief which is equitable relief to order Google, one of the Search Giants, to cease and desist running its negative, destructive and defaming algorithm.
77. The Plaintiff does request at minimum an order issue directing Google to update and correct the “Knowledge Panel” which it refuses to correct. That includes proper demographic information regarding “Divorce” and “Annulment Pending”.
78. The Plaintiff also request a report be ordered to be made to the Court of the efforts to mitigate the damages, when comparing the results of the top three search Giant competitors, by detailing mitigation of the:
 - 78.1. Respond to requests per the User Agreement for a fair, truthful, balance communication via photos of Plaintiff Trenton Garmon in the picture rotation as requested and done by other Search Giant's taking into consideration “helpful” depiction of the information available regarding the objective truth of Plaintiffs lives rather than sensationizing the false, framed arrest and police brutality picture of Garmon,
 - 78.2. Revise and remove the suppression by the destructive algorithm by positive articles and responsive articles to Caucasian Discrimination and “Drug Arrest” over Prescription Medication being suppressed. Proper recognition of the rebuttal or retraction articles including a Medical Prescription Notice. Or otherwise properly update the

Google News Aggregator to not discriminate against an Irish-Cherokee Catholic dad as it refuses to recognize links to credible sources.

78.3. Removal of all Pure Spam.

78.4. Specifically Plaintiffs move for equitable and injunctive relief:

(1)Google has self-identified as a “*News Aggregator*” “*News Summation*” or “*News*” site in Its Motion to Dismiss while in Tech Mag releases and online it purports to be Genitive AI or Intelligence Search Algorithm¹⁵, as Defendant appears to allege to be both, with a news results algorithm which is different and distinct from the general search algorithm,

- (a) Thereon that Google does not include the “Holy Water” case in the news summation of AL.com regarding the professional services of Trenton Garmon thus remove the suppression of: (i) <https://www.al.com/topic/Joyce%20Fecteau/index.html>, (ii) <https://www.waff.com/story/22091744/pro-life-demonstrator-found-not-guilty-of-harassment/>, (iii) <https://www.lifesitenews.com/news/pro-life-sidewalk-counselor-who-sprayed-holy-water-at-abortion-clinic-found/>, (iv) <https://whnt.com/news/accused-pro-life-holy-water-harasser-found/>, (v) <https://lifelegaldefensefoundation.org/ask-attorney-interview-trenton-garmon/> . Inclusion of these credible news and story links is a reasonable expectation of the User Agreement and an objective News Aggregator.
- (b) Thereon that Google includes a two line “Article” linked to Above the Law which is not traditional news rather simply says: “Stephanie Ruhle Shows How White Allies Are Supposed

¹⁵ “Greedy best-first search” is another term utilized to describe the Algorithm which may shed light on the intentions masks by “factors” weighed in the Social Scoring system of the Platform for the two main searches - General and News. “Greedy best-first search is an informed search algorithm where the evaluation function is strictly equal to the heuristic function, disregarding the edge weights in a weighted graph because only the heuristic value is considered. Apr 22, 2023 <https://www.codecademy.com>”

To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer. Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.” This is “Pure Spam” and Plaintiffs allege is Caucasian Discrimination as zero people of “color” or other than Caucasian were involved in the case and the subject matter regarded “age”, not race.

- (c) Thereon, Google does not include the “Prescription” or “Medical Marijuana” press release thus for a fact to be determined by the Jury as to what “algorithm basis” the exile of this article from the “News” section despite being ran on AL.com is not a dispute of fact. The suppression of the responsive article is due to be ordered to be removed per the terms of the User Agreement and promises related by law.

(2)Google has self-identified as a “**Knowledge Panel**” displaying company to the extent that it provides demographic information upon which it maintains a first and primary oversight ability to modify and control with or without a “Claim this Panel” request of the individual or business upon which this Panel displays making it now a mere Communication Decency issue but one of direct control in this regard. This is a “Hosting” of information as the cells are directly inputted by the user on the Google Platform and the information is not housed on a Third-Party site.

- (a) Thereon that Garmon has “Claimed this Knowledge Panel” and that Google refuses to make certain changes regarding the status of his marriage,
- (b)The Garmon minors are linked to Trenton Garmon as their biological, legal and natural father which links the minors to fake news, Caucasian Discrimination and otherwise had adversely affected their school, church and friendship relationships. Garmon minors request this Court find them as beneficiaries of the User Agreement and order the Defendants

to remove Pure Spam indirectly linked to their name and creating presumed “white hate” or Caucasian Discrimination in their relationships, false impressions with new people who Google or are told by others of the Google results of their father.

(3)Google has self-identified as being the owner, profiteer and responsible for a Search Engine response algorithm which provides general responses. Meaning Google has admitted that it maintains a separate and distinct search algorithm for the general searches generated upon its platform from that of Google News Aggregator.

(a) Thereon the Google Platform lists that Garmon has a “Drug Charge” arrest news article listed in the general search engine result which does not also listing and suppressing from the same page the “Prescription Medication Notice” included in the press release published by AL.com the same outlet or at all,

(b) Thereon the Google Platform lists that Garmon has a “racial remark” article listed on the general search engine portion of the Platform which is an attack article of LEO, inaccurate and untrue. A responsive article confirming Garmon made zero racial slurs having left a black owned establishment, being driven by black man friend and literally made the remark of “slave” regarding Mass Incarceration specifically the cases he advocates and about himself being subjected to an unlawful arrest. Thus the fake news actually works against Mass Incarceration and Garmon’s advocacy against legal oppression of all races, specifically minorities. By user agreement the article

on <https://www.wcjb.com/content/news/Former-Alabama-Senate-candidates-lawyer-arrested-in-Gainesville-570123531.html>

should be ordered evaluated as “Pure Spam” and removed or a the rebuttal Press Release equal exposure regarding police surveillance and mass incarceration.

- (c) Thereon that Google does not include the “Holy Water” case of AL.com regarding the professional services of Trenton Garmon. Per the agreement of Google with its Users, It is due to be ordered to remove the suppression of: (i) <https://www.al.com/topic/Joyce%20Fecteau/index.html>, (ii) <https://www.waff.com/story/22091744/pro-life-demonstrator-found-not-guilty-of-harassment/>, (iii) <https://www.lifesitenews.com/news/pro-life-sidewalk-counselor-who-sprayed-holy-water-at-abortion-clinic-found/>, (iv) <https://whnt.com/news/accused-pro-life-holy-water-harasser-found/>, (v) <https://lifelegaldefensefoundation.org/ask-attorney-interview-trent-garmon/>. Inclusion of these credible news and story links is a reasonable expectation of the User Agreement and an objective News Aggregator.
- (d) Thereon that Google includes a two line “Article” linked to Above the Law which is not traditional news rather simply says: “Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer. Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.” Google claims this is a News article simply hyperlinked while Garmon claims it is an malicious, “fake news” post tortious and lacking actual news content. By user agreement this should be ordered evaluated as “Pure Spam”.
- (e) Therefore, Google does not include the “Prescription” or “Medical Marijuana” press release, thus Garmon maintains the Birmingham VA has records of all his medications from the time of growth Hormone Treatment at UAB¹⁶ to the use of Medical Cannabis which was a legal prescription issued by Florida at the time of arrest. Thus, Google is violating the good reputation of following military, legal and medical recommendations being a

¹⁶ B22 - Veterans Affairs Records - Red Clinic - confirm the underlying conditions upon which the Medical Cannabis prescription was issued which is private medical information forced into the public eye.

partially disabled Vet who suffered an ankle injury in the U.S. Army which is part of the basis of a “Disabled Vet” benefit and prescription of Medical Cannabis. The intentional exclusion is to create false, dark light of a medical matter. Equitable relief or ordering an equal page listing is requested of the Court and legal relief of a jury for the time period of false light.

WHEREFORE, premises considered the Plaintiffs do herein Petition for Injunctive Relief as stated herein. Given the extent of damages, malicious nature, and overall sacred nature of civil rights the Plaintiff does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000). Respectfully submitted this 12th day of December 2023.

s/ Trenton Garmon

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CERTIFICATE OF SERVICE: I hereby certified that a copy of the foregoing and all filings have been served upon the Defendants by U.S. Mail postage prepaid this the date of filing.

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s/ Trenton Garmon
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Guardian

**NOTICE REASSERTED REGARDING IN-STATE GOOGLE LLC PUBLIC
RECORD LISTING WITH THE ALABAMA SECRETARY OF STATE,
NOTWITHSTANDING REPRESENTATION OF BEING A FOREIGN
CORPORATION.**

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¹⁷<https://www.google.com/about/datacenters/locations/jackson-county/#~:text=Google%20is%20proud%20to%20be%20building%20a%20data%20center%20in%20Alabama.&text=Now%20a%20fully%20operational%20site.%2C%20maintenance%2C%20and%20security%20roles>